



February 2, 2010

**VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)**

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

RE: EB Docket No. 06-36 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of Mid-Plains LD (long distance operations of Mid-Plains Rural Telephone Cooperative, Inc.), please find the attached annual CPNI certification and accompanying statement which is being filed pursuant to Commission Rule 64.2009(e).

Should you have any questions or need further information, please contact me at (512) 343-2544.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Langkop".

Jean Langkop  
Authorized Representative of  
Mid-Plains Rural Telephone Cooperative, Inc.

JL/pjf

Attachments

cc: Best Copy and Printing, Inc (via email [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
Mr. Brent A. Kennedy, Mid-Plains Rural Telephone Cooperative, Inc.

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year 2009

Date: January 29, 2010

Name of company covered by this certification: Mid-Plains LD (long distance  
operation of Mid-Plains Rural  
Telephone Cooperative, Inc.)

Form 499 Filer ID: 801024

Name of signatory: Brent A. Kennedy

Title of signatory: General Manager

I, Brent A. Kennedy, certify that I am an officer of the Cooperative named above, and acting as an agent of the Cooperative, that I have personal knowledge that the Cooperative has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

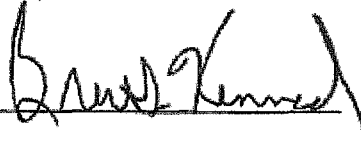
Attached to this certification is an accompanying statement explaining how the Cooperative's procedures ensure that the Cooperative is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Cooperative has not taken any actions (proceedings instituted or petitions filed by the Cooperative at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. The Cooperative is not aware of any attempts by pretexters to access the CPNI of the Cooperative's customers and has not had to take any actions against data brokers.

The Cooperative has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The Cooperative represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Cooperative also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Attachment: Accompanying Statement explaining CPNI procedures

## **ACCOMPANYING STATEMENT**

To the best of my knowledge, Mid-Plains LD (Mid-Plains Rural Telephone Cooperative, Inc.'s long distance operation) ("the Cooperative") is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Cooperative's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations, 47 C.F.R §64.2001 through §64.2011.

Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with C.F.R. §64.2010, including, but not limited to the following: Customers are properly authenticated before disclosing CPNI on customer-initiated telephone calls, business office visits, or online access to customer accounts. Authentication through the use of passwords and back-up authentication questions in the event of lost or forgotten passwords has been implemented. Passwords and back-up authentication questions are established in accordance with §64.2010(e). Customers are authenticated in compliance with §64.2010(c) prior to online access to customer account information. The Cooperative has implemented procedures to notify customers whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

The Cooperative has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. In accordance with Company Policy, any employee that uses, discloses, or permits access to CPNI in violation of Federal regulations is subject to disciplinary action, and possible termination.

The Cooperative provides notice to the customer of their right to restrict use of disclosure of, and access to that customer's CPNI, and uses the opt-out method to solicit approval to use its customer's individually identifiable CPNI for the purpose of marketing communications-related services in compliance with §§ 64.2007 and 64.2008. The Cooperative is aware of the requirement that notice is to be provided to the Commission within five business days of any instances where the opt-out mechanism does not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly. However, no circumstances have yet required such a notification by the Cooperative. Supervisory approval must be obtained of any proposed outbound marketing request for customer approval.

**Mid-Plains LD**

**CPNI Certification covering year 2009**

The Cooperative requires express opt-in consent from a customer prior to the release of CPNI to a joint venture partner or independent contractor for marketing purposes. However, currently the Cooperative has no joint venture partner and does not release CPNI to any third parties for marketing purposes.

The Company has assigned a Director for CPNI Compliance to serve as the central point of contact regarding the Company's CPNI responsibilities and questions related to CPNI Policy. The Director for CPNI Compliance has responsibilities including, but not limited to, supervising the training of all Company employees with access to CPNI, investigating complaints of unauthorized release of CPNI, and reporting any breaches to the appropriate law enforcement agencies. The Director for CPNI Compliance also maintains records in accordance with FCC CPNI rules, including records of any discovered breaches, notifications of breaches to law enforcement, and law enforcements' responses to the notifications for a period of at least two years.